

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Estate
of Bernard L. Madoff,

Plaintiff,

v.

RICHARD M. GLANTZ, et al.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05394 (SMB)

**STIPULATION AND ORDER EXTENDING TRUSTEE'S TIME TO
MOVE TO STRIKE AFFIRMATIVE DEFENSES**

WHEREAS, on January 22, 2018, Irving H. Picard as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. ("SIPA"), and the substantively consolidated

chapter 7 estate of Bernard L. Madoff individually, filed the Second Amended Complaint in the above-captioned adversary proceeding; and

WHEREAS, on March 23, 2018, the defendants (“Defendants”) filed their Answer and Affirmative Defenses to the Second Amended Complaint; and

WHEREAS, on April 12, 2018, the Trustee and Defendants agreed and stipulated, and this Court so ordered, that the time by which the Trustee may move to strike affirmative defenses would be extended up to and including May 4, 2018;

WHEREAS, on May 3, 2018, the Trustee and Defendants agreed and stipulated, and this Court so ordered, that the time by which the Trustee may move to strike affirmative defenses would be extended up to and including May 18, 2018;

IT IS THEREFORE MUTUALLY AGREED AND STIPULATED, by and between the Trustee and Defendants, that the time by which the Trustee may move to strike affirmative defenses is further extended up to and including May 25, 2018.

The extension of time granted herein is without prejudice to any future extensions of time. Except as expressly set forth herein, the parties reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses.

This stipulation may be signed by the parties in any number of counterparts, each of which shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

[signatures on next page]

Dated: New York, New York
May 17, 2018

BAKER & HOSTETLER LLP

By: /s/ Andrew W. Reich
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Fernando J. Bohorquez
Email: fbohorquez@bakerlaw.com
Andrew W. Reich
Email: areich@bakerlaw.com
Joshua B. Rog
Email: jrog@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

**Dated: May 18, 2018
New York, New York**

LAW OFFICE OF RICHARD E. SIGNORELLI

By: /s/ Richard E. Signorelli
52 Duane Street, 7th Floor
New York, New York 10007
Telephone: 212.254.4218
Facsimile: 212.254.1396
Richard E. Signorelli
Email: richardsignorelli@gmail.com
Email: rsignorelli@nyclitigator.com
Bryan Ha
Email: bhanyc@gmail.com

*Attorneys for Defendants RICHARD M. GLANTZ,
individually, as trustee of the Glantz-Ostrin Trust
II, as personal representative of the Estate of
Edward R. Glantz, and as administrator of the
Estate of Thelma Glantz; EJS ASSOCIATES, L.P.;
JELRIS & ASSOCIATES, L.P.; GRACE &
COMPANY; THE GLANTZ FAMILY
FOUNDATION, INC; THE ESTATE OF EDWARD
R. GLANTZ; LAKEVIEW INVESTMENT, LP;
VISTA MANAGEMENT CO.; LAW &
MEDIATION OFFICES OF RICHARD M.
GLANTZ, A PROFESSIONAL CORPORATION;
ELAINE OSTRIN; THE ESTATE OF THELMA
GLANTZ; THE GLANTZ-OSTRIN TRUST II; and
AUSTIN BOSARGE*

SO ORDERED

/s/ STUART M. BERNSTEIN
**HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE**